



Middlebury College COVID-19 Exposure Control Plan for Vermont Locations Revised 6-15-2021

PURPOSE

The purpose of Middlebury College's COVID-19 Exposure Control Plan is to protect the health and safety of our employees and, by extension, their families and our communities from the respiratory disease COVID-19, which is caused by the novel coronavirus SARS-CoV-2.

This plan implements COVID-19 health and safety guidance from federal and state agencies:

- [Centers for Disease Control and Prevention \(CDC\)](#)
- Occupational Safety and Health Administration (OSHA): [Protecting Workers: Guidance on Mitigating and Preventing the Spread of COVID-19 in the Workplace](#)
- Vermont Occupational Safety and Health Administration (VOSHA): [Memo: Workplace Safety Top 10 Recommendations Relating to COVID-19](#)

SCOPE

This COVID-19 Exposure Control Plan applies to Middlebury College's Vermont locations.

RESPONSIBILITIES

Environmental Health and Safety Office (EHS)

- Assess the hazards in the workplace and identify control measures.
- Regularly review guidance from VTDOH, CDC, VOSHA, and VTACCD and update this plan as required.
- Provide guidance to managers, supervisors, and employees on preventative measures (engineering controls, administrative controls) to reduce exposure to COVID-19.

Department Managers and Supervisors

- Review this plan and develop department-specific protocols as needed.
- Ensure that all employees are trained on exposure control measures and follow necessary protocols.

Employees

- Follow all safety requirements required by College policy and work practices identified in department-specific protocols.



EXPOSURE DETERMINATION

Middlebury's protocols for workplace safety throughout the COVID-19 pandemic have been rooted in safety for our faculty, staff, and students. On-campus work has been carefully assessed and occurs in a measured way to mitigate potential risks and protect the safety of our community.

Vaccination is the key mitigation measure in Middlebury's multilayered approach to protect our community. All students, faculty, and staff on campus must be fully vaccinated prior to working or living on campus, unless they have an approved religious or medical exemption. CDC and VOSHA guidance indicates that fully vaccinated people are less likely to have symptomatic infection or transmit the virus to others. **Requiring vaccination of our campus community reduces an employee's risk of exposure to COVID-19 in the workplace.**

CDC and VOSHA continue to recommend precautions for employees who are unvaccinated or who are fully vaccinated but may be at risk due to immunocompromising conditions. See the CDC's pages describing [Vaccines for People with Underlying Medical Conditions](#) and further definition of [People with Certain Medical Conditions](#). Those employees should discuss the need for additional protections with their healthcare providers. Consistent with Middlebury's [ADA policy](#), employees who have any of the medical conditions identified by the CDC as elevating the risks posed by COVID-19 and who require reasonable accommodations to perform their job duties should contact [Human Resources](#).

Appendix A (Workplace COVID-19 Exposure Determination and PPE Requirements) describes an employee's risk of occupational exposure to COVID-19 and should be consulted for departments with high risk activities or to assess exposure risk level in the workplace for unvaccinated or at-risk employees.

HAZARD REDUCTION

This hierarchy of hazard controls shown in Figure 1 is a framework widely used in occupational health and safety to group hazard controls by effectiveness.

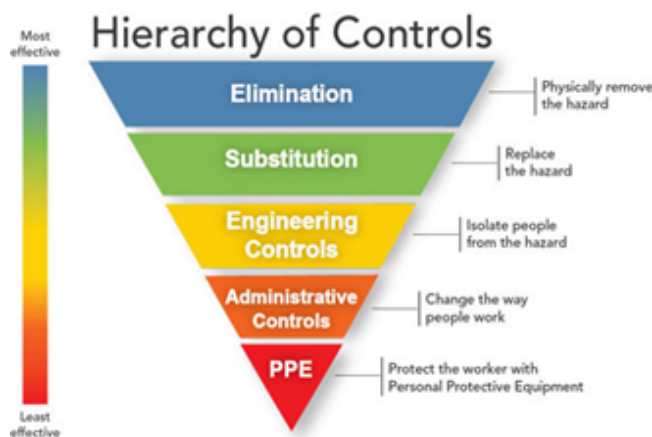


Figure 1. Effectiveness of Hazard Controls



Elimination or Substitution

The most effective way to control a hazard is by elimination or substitution, where the hazard is physically removed or replaced. In the case of COVID-19, vaccines authorized by the U.S. Food and Drug Administration in the United States are highly effective at protecting most fully vaccinated people against symptomatic and severe COVID-19. **An individual is considered fully vaccinated two weeks or more after they have completed their final dose of a COVID-19 vaccine.**

For workers who are unvaccinated or who are otherwise at risk, [OSHA recommends](#) implementing multiple layers of controls. Key controls to help protect unvaccinated or otherwise at-risk workers include separating from the workplace all infected people, all people [experiencing COVID symptoms](#), and any unvaccinated people who [have had a close contact](#) with someone with COVID-19, implementing physical distancing, maintaining ventilation systems, and properly using [face coverings](#) or personal protective equipment (PPE) when appropriate. Engineering and administrative controls below may be considered.

Engineering Controls

Engineering controls are a way of isolating people from the hazard. These engineering controls may be considered in work areas:

- HVAC assessments and modifications. A ventilation assessment team including outside engineering and industrial hygiene experts has implemented a number of modifications to building HVAC systems, with control strategies specific for each building. Facilities Services works with individuals responsible for specific campus buildings to address particular issues.
- Physical barriers (such as plexiglass shields) to separate employees from others in any public-facing or high-traffic work areas, where employees cannot adequately maintain physical distance from the general public.
- Isolation of tasks by relocating specific work to other locations can be considered if there is a need to reduce an employee's exposure to others.

Administrative Controls

Administrative controls can be very effective in preventing the spread of COVID-19. These administrative controls may be considered:

- Remote work, by using technology to relocate a task that may normally be conducted on-site.
- Adjust schedules or stagger breaks to reduce an employee's exposure to others.
- Reclassify the occupancy of common areas and break areas to allow for physical distancing.
- Set up a safe process, such as outside pickup/exchange or contactless transfer, to receive supplies and deliveries from vendors and suppliers.



Face Coverings

The primary intent of face coverings is to prevent the wearer from spreading the virus to others through respiratory droplets, and they are considered source control. However, well-fitting face coverings can also provide protection for the wearer from getting infected. Use [CDC Guidance](#) to select a proper face covering. Face coverings should fit snugly but comfortably against the side of the face, include multiple layers of fabric, allow for breathing without restriction, have a nose wire if possible, and be able to be laundered and machine dried without damage or change to shape.

Face covering requirements will be indicated on the Campus Status web page. Many members of our campus community will choose to wear face coverings even after the campus requirements change, and if so, employees are supported in their decisions. There are many reasons that an individual may wear a face covering, including the following:

- An individual may be immunocompromised,
- An individual may live with someone who is immunocompromised,
- An individual may have unvaccinated children at home,
- An individual may live with someone who is not fully vaccinated,
- An individual may be unvaccinated, or
- An individual may prefer to wear a face covering to prevent spreading or being exposed to other illnesses, in addition to COVID-19.

IMPORTANT NOTE: Certain employees, such as Health Center staff when in patient care settings or employees providing first aid application, will be required to wear face coverings due to workplace safety requirements and protocols.

Health and Safety Protocols

[Appendix B COVID-19 Exposure Control Checklist](#) assists department managers and supervisors in following COVID-19 health and safety guidance in their work areas. Employees must be informed about these requirements and any applicable department-specific protocols.



APPENDIX A: Exposure Determination and Personal Protective Equipment

Vaccination is the key mitigation measure in Middlebury's multilayered approach to protect our community. All students, faculty, and staff on campus must be fully vaccinated prior to working or living on campus, unless they have an approved religious or medical exemption. CDC and VOSHA guidance indicates that fully vaccinated people are less likely to have symptomatic infection or transmit the virus to others. Requiring vaccination of our campus community provides a safe and healthy environment for employees.

CDC and VOSHA continue to recommend precautions for employees who are unvaccinated or who are fully vaccinated but may be at risk due to immunocompromising conditions.

- If COVID-19 is not present in the community, an employee who is unvaccinated or at risk has low occupational exposure to COVID-19.
- If COVID-19 is present in a community, an employee's risk of occupational exposure to COVID-19 depends in part on the industry type and the need for contact within six feet of people known to be, or suspected of being, infected with COVID-19. As employees' job duties change or they perform different tasks in the course of their workday, they may move from one exposure risk level to another. VOSHA has divided job tasks into four exposure risk levels, as shown in the occupational risk pyramid in Figure 2.

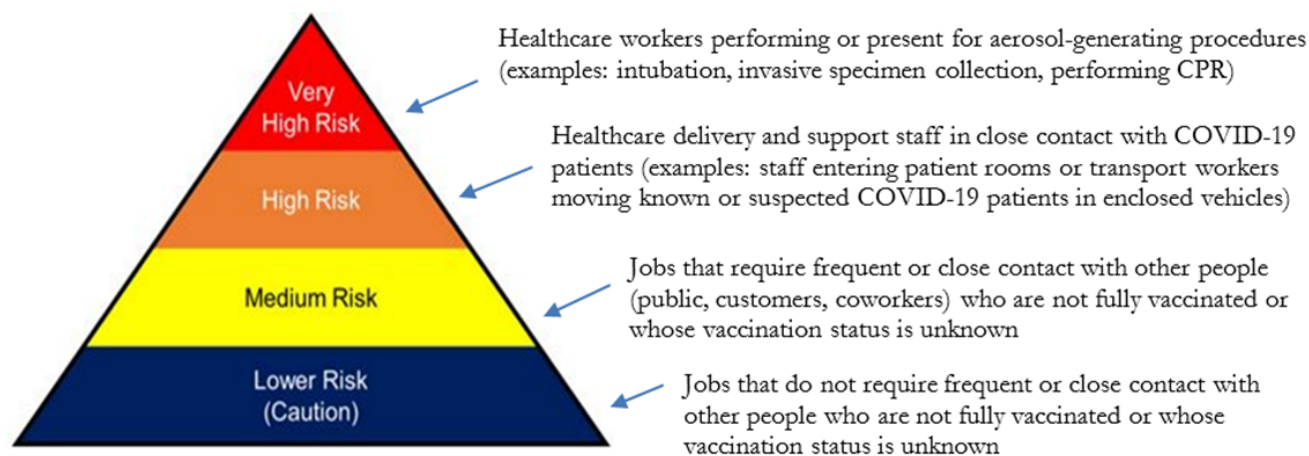


Figure 2. COVID-19 Occupational Exposure Risk

Middlebury College has conducted a hazard assessment to determine employee risk level and exposure potential. This has been determined by position and/or job task.

Very High Risk (only considered very high risk when performing tasks described below)

- Employees who perform or are present for aerosol-generating activities, such as specimen collection, performing CPR on known or suspected COVID-19 patients (Health Center staff, Public Safety staff).

High Risk (only considered high risk when performing tasks described below)



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- Employees who are required to be in frequent close contact with known or suspected COVID-19 patients (Health Center staff, Public Safety staff).
- Employees transporting known or suspected COVID-19 patients only if in enclosed vehicles where good ventilation (open windows) is not possible.
- Employees trained to enter isolation housing AND who require frequent close contact with known or suspected COVID-19 patients (Health Center staff, Public Safety staff, some staff from Residential Life in situations where physical distancing is not possible).
- Cleaning visible blood, body fluids (including respiratory sections, mucous, etc.), or other potentially infectious materials from people suspected of having or known to have COVID-19. Note: Exposure risk associated with such work tasks may be lower if proper engineering and administrative controls, safe work practices, and PPE are used.

Medium Risk

- Employees entering isolation or quarantine housing who are able to maintain proper physical distancing and do not require any close contact with known or suspected COVID-19 patients (Public Safety and some staff from Residential Life, Custodial Services, Facilities Services).
- Employees who are in frequent close contact with other people (public, customers, coworkers) who are not fully vaccinated or whose vaccination status is unknown, for example in the following circumstances:
 - Working at public-facing locations, where the public or members of the Middlebury community may come for assistance, such as service desks, reception areas, retail locations.
 - Performing job tasks in close proximity to others or for a long duration of time in an enclosed location with limited ventilation.
 - Emergency response requiring close proximity to others, such as performing first aid.

Low Risk

- Employees working in close contact with other people who are fully vaccinated.
- Employees working on-site that can follow the core protective health measures of wearing face coverings and maintaining proper physical distancing of six feet from others.
- Employees working remotely.

Personal Protective Equipment for Very High or High Exposure Risk

When an employee's work task requires the need for close contact with an individual potentially or known to be infected with COVID-19, they fall into a very high or high exposure risk. The exposure risk can be reduced significantly by wearing personal protective equipment (PPE) properly. In addition, they should provide the infected person with a standard surgical mask to cover their nose and mouth, if they are not already wearing one. Employees required to wear PPE will receive specific training on the proper use of PPE, donning and doffing techniques, and the protocols for the specific task they are performing. PPE may include some or all of the following:



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- **Gloves:** Various gloves protect against varying hazards; most commonly, medical-grade nitrile or latex gloves are used to protect against COVID-19 exposures.
- **Body protection:** In some situations, varying forms of body protection are worn to protect from COVID-19 exposure (isolation gowns, Tyvek suits, cloth laboratory coats or scrubs).
- **Eye/face protection:** A face shield or eye protection (goggles or, at a minimum, safety glasses with side protection may be worn for medium risk tasks) should be worn for those involved in the direct contact of known or suspected COVID-19 infected individuals; face shields can be used in conjunction with eye protection.
- **Respiratory protection:** These must be used in compliance with Middlebury College's Respiratory Protection Program (which complies with OSHA 29 CFR 1910.134):
 - **N95 Respirators**
 - **Proper training and fit testing is required** before using any N95 respirator; contact the EHS Office for more information.
 - Due to the COVID-19 pandemic, N95 respirators are in short supply and should be saved for healthcare providers, first responders, and any College staff who may be required to have close contact (within six feet) of an individual with COVID-19 or direct contact with body fluids from an individual with COVID-19.
 - **Powered Air Purifying Respirators (PAPRs)**
 - PAPRs may be used as respiratory protection in the case of an employee not medically cleared to wear an N95 respirator or who cannot successfully pass a fit test, or N95s are not available.
 - PAPRs require a medical evaluation and training (no fit test).
- **Three-ply disposable face masks:** These types of face masks provide droplet protection in addition to serving as source control by reducing transmission, and should be worn in conjunction with a face shield by College staff who may be required to have close contact (within six feet) of others who are potentially infected with COVID-19. To improve the fit with a disposable mask, knot the ear loops where they join the edge of the mask, then fold and tuck the unneeded material under the edges. This method is called "knotting and tucking."

[APPENDIX B:](#)

[COVID-19 Exposure Control Checklist](#)

(use link to access checklist)